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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

December 9, 1992

FCC Mass Media Services
P.O. Box 358195
Pittsburgh, PA 15251-5180

FCC/MELLOS DEC 14 1992

re: Rulemaking request

Dear Mr. or Ms.:

I hereby request that Section 73.202(b), Table of FM Allotments be amended as follows:

<u>CITY</u>	<u>EXISTING</u>	<u>PROPOSED</u>
Ridgecrest, California	285 A	285 B1
Lenwood, California	285 A	283 A


Roy William Mayhugh TR/AS KLOA-FM seeks to upgrade the class of operation of KLOA-FM to class B1 from a new transmitter site 6 kilometers south east of the present site. The upgrade is being sought to improve the level of service to the public.

The upgrade will require the permittee of KIQQ Lenwood, California to change channel. This change will improve KIQQ's level of service in that it removes a site restriction thereby permitting permittee to operate at full power from his chosen site. This will improve KIQQ's level of service to the public and is agreeable to the permittee. A letter from permittee agreeing to the amendment is attached to this request.

Should the request be granted, petitioner shall file an application seeking the facilities sought in this request. Upon grant of a construction permit for the facilities sought petitioner will commence and complete construction in an expeditions and timely manner.

Please contact the petitioner at the above address as needed. Thank you for your consideration of this matter.

Sincerely,


Roy William Mayhugh

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September 28, 1992

Roy Mayhugh
KLOA Radio
731 N. Balsam Street
Ridgecrest, CA 93555

Dear Mr. Mayhugh:

KIQQ FM hereby agrees to help you to bring about a change in rulemaking to change your KLOA FM from your existing 285A to 285 B1.

KIQQ FM understands that in giving permission for KLOA FM to make this change, that KIQQ FM will be allowed to file to upgrade the facilities as well, upon approval.

As owner and license holder, I agree with this change of rulemaking and will file for an upgrade on this change.

All changes and filings will be at no cost to me, and the new frequency will then be 104.5.

Any questions, please feel free to contact me.

Sincerely,

A handwritten signature in cursive script that reads "Eneida Orchard".

Eneida Orchard
KIQQ RADIO
Owner

JAMES B. HATFIELD, PE
BENJAMIN F. DAWSON III, PE
THOMAS M. ECKELS, PE

PAUL W. LEONARD, PE
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MAURY L. HATFIELD, PE
CONSULTANT
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AUSTRALIA

ENGINEERING STATEMENT

PETITION FOR RULEMAKING TO
AMEND SECTION 73.202 OF THE RULES
AND REGULATIONS OF THE FEDERAL
COMMUNICATIONS COMMISSION
TO ASSIGN FM CHANNEL 285 B1
FOR USE AT RIDGECREST, CALIFORNIA

KLOA RADIO

8/92

ENGINEERING STATEMENT

This Engineering Statement has been prepared on behalf of KLOA Radio in support of a Petition for Rulemaking to revise §73.202 of the Commission's Rules to assign channel 285 B1 for use at Ridgecrest, California, as a replacement for the current allotment used by KLOA, channel 285A.

As outlined in the attached channel studies, channel 285 B1 can be assigned for use at Ridgecrest in compliance with the Commission's applicable Rules and Regulations regarding the separation among FM allotments except with respect to KIQQ, licensed to Lenwood, California. To accommodate the proposed change it will be necessary for KIQQ to move from channel 285 A to channel 283 A. This change of channel will provide KIQQ the opportunity for operation with full 6 kilowatt Class A facilities. The licensee has agreed to the proposed channel change. The KLOA proposed site is located 6 kilometers southeast of the current licensed site, and all parts of the community of Ridgecrest are located within 39 kilometers of the proposed reference coordinates.

Hatfield & Dawson Consulting Engineers

FM SEPARATION STUDY

Job Title :KLOA PRM SITE

Separation Buffer 100 km

FCC DB Date : 07/28/92

Channel 285B1 (104.9 MHz)

Coordinates : 35-36-27 117-37-29

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KERNFM LIC	Bakersfield CA	BLH4421	231B 94.1	4.5 399.0	35-26-20 118-44-23	259.8	102.86 85.86	17 CLEAR
K232AM CP	China Lake, etc. CA	BPFT791226ID	232D 94.3	.0	35-28-48 117-40-59	200.4	15.11 .00	0 TRANS
TRANSLATOR FOR KNX-FM, LOS ANGELES, CA.								
KDUC LIC	Barstow CA	BLH911031KC	232B1 94.3	4.6 239.0	34-58-15 117-02-22	142.9	88.46 74.46	14 CLEAR
KXHA CP	Shafter CA	BPH880217MN	282A 104.3	3.00 94.0	35-25-10 119-11-54	262.1	144.28 96.28	48 CLEAR
KBIG LIC	Los Angeles CA	BLH5494	282B 104.3	105. 881.0	34-13-36 118-03-59	194.8	158.42 87.42	71 CLEAR
GRANDFATHERED AT 78KW @ 881M HAAT. Proposed to Mexico as C 910503-Accepted by Mexico 910917								
KJUL LIC	North Las Vegas NV	BLH890413KC	282C 104.3	24.5 1136.0	35-58-02 115-30-06	77.6	196.06 91.06	105 CLEAR
KVLIFM CP	Lake Isabella CA	BPH8808250A	283A 104.5	.200 384.0	35-37-21 118-26-16	271.5	73.69 25.69	48 CLEAR
KCAQ LIC	Oxnard CA	BMLH880906KE	284B 104.7	2.85 482.0	34-20-53 119-20-07	228.6	209.57 64.57	145 CLEAR
KDESFM APP	Palm Springs CA	BPH881128IB	284B 104.7	2.0 159.0	33-51-56 116-26-04	150.3	221.86 76.86	145 CLEAR
Erp below minimum for class								
KDESFM LIC	Palm Springs CA	BLH7536	284B 104.7	42. 165.0	33-51-56 116-26-04	150.3	221.86 76.86	145 CLEAR
NEGOTIATED-LESS SEPARATION THAN ESTBLISHED.MAY OPERATE MAX FAC.								
KLOAFM LIC	Ridgecrest CA	BLH790226AF	285A 104.9	0.75 .0	35-37-24 117-41-10	287.6	5.84 -137.16	143 SHORT
KIQQFM APP	Lenwood CA	BMPH910301IE	285A 104.9	1.10 142.0	34-51-20 117-02-57	147.8	98.52 -44.48	143 SHORT
KIQQFM CP	Lenwood CA	BPH880714NP	285A 104.9	3.00 91.0	34-50-00 117-02-53	148.5	100.67 -42.33	143 SHORT

FM SEPARATION STUDY

Job Title :KLOA PRM SITE Separation Buffer 100 km
FCC DB Date : 07/28/92
Channel 285B1 (104.9 MHz) Coordinates : 35-36-27 117-37-29

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
KQYZ	Tipton		285A	2.30	36-10-07	293.5	159.51	143
APP	CA	BPH910924IG	104.9	161.0	119-15-04		16.51	CLEAR
From Channel 285A, Lemoore, CA Per D90-482-Amended 920302								
K285AP	Rhyolite & Goldfield		285D		36-56-09	25.0	163.04	0
LIC	NV	BLFT810713IA	104.9	.0	116-50-58		.00	TRANS
TRANSLATOR FOR KILA, HENDERSON, NV.								
	Tipton		285B1		36-02-58	286.9	175.16	175
ALC	CA	Docket90-482	104.9	.0	119-29-08		.16	CLOSE
Site restricted-Effective 6-27-91-Reserved for KQYZ Per D90-482								
KQYZ	Lemoore		285A	3.00	36-17-11	292.7	200.92	143
LIC	CA	BLH810327AC	104.9	56.0	119-41-21		57.92	CLEAR
*To channel 285B1, Tipton, CA Per D90-482								
K285AS	Indian Springs		285D		36-35-38	57.9	210.19	0
LIC	NV	BLFT820830IN	104.9	.0	115-37-55		.00	TRANS
TRANSLATOR FOR KILA, HENDERSON, NV.								
K285CP	Mammoth Lakes		285D	.005 DA	37-34-31	339.6	233.51	0
LIC	CA	BLFT861121TA	104.9	898.0	118-32-58		.00	TRANS
TRANSLATOR FOR KZIQ, RIDGECREST, CA.								
NEW	San Clemente		285A	1.05	33-25-52	179.4	241.44	143
APP	CA	850712VI	104.9	144.0	117-35-47		98.44	CLEAR
Amended 880201								
NEW	San Clemente		285A	1.10	33-25-51	179.4	241.47	143
APPD	CA	BPH850712UP	104.9	141.0	117-35-47		98.47	CLEAR
Initial Decision 910905-Application for Review 920316								
NEW	San Clemente		285A	1.00 DA	33-25-50	179.4	241.50	143
APP	CA	BPH850712VJ	104.9	146.0	117-35-47		98.50	CLEAR
AMENDED 860106 & 900108-Initial decision 910905-Application for Review 920316								
KKGOFM	Los Angeles		286B	18.0	34-13-45	194.9	158.19	145
LIC	CA	BLH870225KA	105.1	880.0	118-04-04		13.19	CLOSE
GRANDFATHERED @ 18KW & 880M HAAT								
Proposed to Mexico as C 910610-Accepted by Mexico 911015								
KRBO	Las Vegas		286C2	50.0	36-20-00	67.7	219.46	134
CPM	NV	BMPH901214IF	105.1	150.0	115-21-41		85.46	CLEAR

FM SEPARATION STUDY

Job Title :KLOA PRM SITE

Separation Buffer 100 km

FCC DB Date : 07/28/92

Channel 285B1 (104.9 MHz)

Coordinates : 35-36-27 117-37-29

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
	Yermo		287A		34-55-18	134.3	108.63	48
ALC	CA	Docket88-438	105.3	.0	116-46-22		60.63	CLEAR
Site Restricted-Effective 11-27-89								
NEW	Yermo		287A	3.0	34-55-18	134.0	109.36	48
APP	CA	BPH891228MM	105.3	25.0	116-45-42		61.36	CLEAR
NEW	Yermo		287A	.560	34-48-30	135.8	123.32	48
APP	CA	BPH891228MK	105.3	316.0	116-41-01		75.32	CLEAR
ERP/HAAT Combination exceeds maximum value for the International Agreement Accepted by Mexico 910313								
KKXX	Delano		287B	35.	35-30-53	265.9	130.67	71
LIC	CA	BLH861008KD	105.3	177.0	119-03-41		59.67	CLEAR
K288AX	China Lake, etc.		288D		35-28-48	200.4	15.11	0
LIC	CA	BLFT156	105.5	.0	117-40-59		.00	TRANS
TRANSLATOR FOR KOST, LOS ANGELES, CA.								
KAVC	Rosamond		288A	2.90	34-51-03	210.0	96.90	48
LIC	CA	BLH850408KD	105.5	94.0	118-09-22		48.90	CLEAR
K288DJ	Victorville, etc.		288D	.002	34-36-38	164.5	114.78	0
LIC	CA	BLFT900423TD	105.5	609.0	117-17-19		.00	TRANS
TRANSLATOR FOR KFSG, LOS ANGELES, CA.								

** End of separation study for channel 285B1 **

FM SEPARATION STUDY

Job Title :KIQQ(FM) LENWOOD, CA Separation Buffer 100 km
FCC DB Date : 07/28/92
Channel 283A (104.5 MHz) Coordinates : 34-51-20 117-02-57

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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KZLAFM	Los Angeles		230B	18.5 DA	34-13-57	233.8	116.57	15
LIC	CA	BLH910802KA	93.9	956.0	118-04-18		101.57	CLEAR
Proposed to Mexico as C 910610-Accepted by Mexico 911015								
ERP/HAAT combination exceeds maximum value allowed under International agreement								

KBON	Lake Arrowhead		280A	0.19	34-14-05	186.9	69.38	31
CP	CA	BPH901219IA	103.9	534.0	117-08-23		38.38	CLEAR
Proposed to Mexico as B 910507-Accepted by Mexico 910917								
ERP/HAAT combination exceeds the maximum value for International agreement								

KBON	Lake Arrowhead		280A	.038	34-13-50	193.7	71.37	31
LIC	CA	BLH7799	103.9	774.0	117-14-00		40.37	CLEAR
Proposed to Mexico as B 910507-Accepted by Mexico 910917								

KRAJ	Johannesburg		280B1	1.50	35-28-39	319.7	90.95	48
CP	CA	BPH910509ID	103.9	403.0	117-41-58		42.95	CLEAR
From channel 280A per D88-601								

KRAJ	Johannesburg		280A	0.35	35-28-39	319.7	90.95	31
LIC	CA	BLH900103KA	103.9	403.0	117-41-58		59.95	CLEAR
*To channel 280B1 per D88-601								

K280CV	Cathedral City		280D	0.04 DA	33-52-12	152.4	123.34	0
CP	CA	BPFT911023TA	103.9	427.0	116-25-43		.00	TRANS
Translator for KROR, Yucca Valley, CA- Vertical polarization only								

K280CV	Cathedral City		280D	.005 DA	33-52-12	152.4	123.34	0
LIC	CA	BLFT890612TJ	103.9	427.0	116-25-43		.00	TRANS
Translator for KROR, Yucca Valley, CA								

	Essex		280B		34-44-12	94.1	165.49	69
PADD	CA		103.9	.0	115-14-48		96.49	CLEAR
Mexican concurrence required								

KBIG	Los Angeles		282B	105.	34-13-36	233.4	116.57	113
LIC	CA	BLH5494	104.3	881.0	118-03-59		3.57	CLOSE
GRANDFATHERED AT 78KW @ 881M HAAT.								
Proposed to Mexico as C 910503-Accepted by Mexico 910917								

KJUL	North Las Vegas		282C	24.5	35-58-02	48.2	187.01	165
LIC	NV	BLH890413KC	104.3	1136.0	115-30-06		22.01	CLEAR

FM SEPARATION STUDY

Job Title :KIQQ(FM) LENWOOD, CA Separation Buffer 100 km
FCC DB Date : 07/28/92
Channel 283A (104.5 MHz) Coordinates : 34-51-20 117-02-57

Call Status	City State	FCC File No.	Channel Freq.	ERP(kW) HAAT(m)	Latitude Longitude	Bearing deg-Tru	Dist. (km)	Req. (km)
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KVLIFM	Lake Isabella	283A	.200	35-37-21	304.5	152.38	115	
CP	CA	BPH8808250A	104.5	384.0	118-26-16	37.38	CLEAR	

XHERS	Tijuana	283B	57.	32-31-25	179.2	258.67	240	
BN		104.5	188.0	117-00-35		18.67	CLEAR	

NEGOTIATED-LESS SEPARATION THAN ESTABLISHED. MAY OPERATE MAX. FAC.

ALC	Lake Havasu City	283C2	.0	34-32-54	96.6	263.84	166	
	AZ	Docket90-468	104.5	114-11-37		97.84	CLEAR	

Effective 10-15-91-Reserved for KZULFM per D90-468

KDESFM	Palm Springs	284B	2.0	33-51-56	152.7	123.53	113	
APP	CA	BPH881128IB	104.7	116-26-04		10.53	CLOSE	

Erp below minimum for class

KDESFM	Palm Springs	284B	42.	33-51-56	152.7	123.53	113	
LIC	CA	BLH7536	104.7	116-26-04		10.53	CLOSE	

NEGOTIATED-LESS SEPARATION THAN ESTABLISHED. MAY OPERATE MAX FAC.

KIQQFM	Lenwood	285A	1.10	34-51-20	.0	.00	31	
APP	CA	BMPH910301IE	104.9	117-02-57	SS	-31.00	SHORT	

KIQQFM	Lenwood	285A	3.00	34-50-00	177.7	2.48	31	
CP	CA	BPH880714NP	104.9	117-02-53		-28.52	SHORT	

KLOAFM	Ridgecrest	285A	0.75	35-37-24	326.1	103.05	31	
LIC	CA	BLH790226AF	104.9	117-41-10		72.05	CLEAR	

KKGOFM	Los Angeles	286B	18.0	34-13-45	233.5	116.50	69	
LIC	CA	BLH870225KA	105.1	118-04-04		47.50	CLEAR	

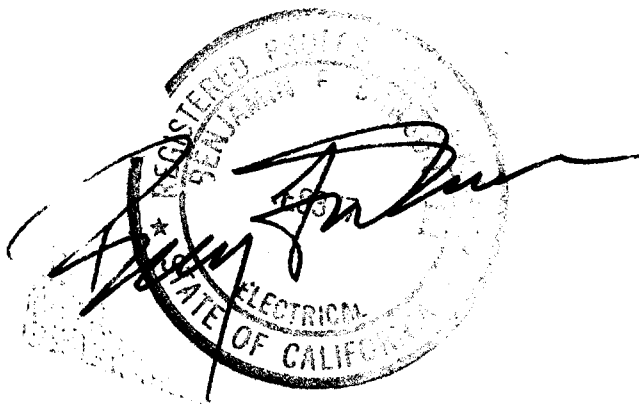
GRANDFATHERED @ 18KW & 880M HAAT
Proposed to Mexico as C 910610-Accepted by Mexico 911015

** End of separation study for channel 283A **

STATEMENT OF ENGINEER

This Engineering Statement supporting a Petition for Rulemaking to revise the Table of Allotments to specify channel 285 B1 for use at Ridgecrest, California, has been prepared on behalf of KLOA Radio. All representations herein are true to the best of my knowledge. I am an experienced radio engineer whose qualifications are a matter of record with the Federal Communications Commission. I am a partner in the firm of Hatfield & Dawson, Consulting Engineers, and am Registered as a Professional Engineer in the States of California and Washington.

August 19, 1992



Benjamin F. Dawson III, P.E.

Hatfield & Dawson Consulting Engineers